

EXHIBIT I

From: Daluz, Tobey Marie
Sent: Monday, March 25, 2024 2:13 PM
To: Pise, Adi; chesterstormwaterauthority; Van Meter, Lauren; Nagavalli, Suhas
Cc: Steve Hann
Subject: RE: Chester Bankruptcy Information Request for SACC

SAC Team:

In connection with our prior Information Request, we have a follow up request. Will you please send a copy of all agreements between SAC and Corvias, including any amendments?

Tobey Marie Daluz
She/Her/Hers
Ballard Spahr LLP
919 N. Market Street, 11th Floor
Wilmington, DE 19801-3034
Direct 302.252.4440
Fax 302.300.4050
Mobile 215.313.3299
daluzt@ballardspahr.com
www.ballardspahr.com

From: Daluz, Tobey Marie
Sent: Monday, November 13, 2023 2:29 PM
To: 'Pise, Adi' <Adi.Pise@hdrinc.com>
Cc: chesterstormwaterauthority <chesterstormwaterauthority@chesterstormwaterauthority.com>; Steve Hann <shann@hrmml.com>; Van Meter, Lauren <Lauren.VanMeter@hdrinc.com>; Nagavalli, Suhas <Suhas.Nagavalli@hdrinc.com>
Subject: RE: Chester Bankruptcy Information Request for SACC

Adi:

Please see our comments (in [purple](#)) in your chart below which attempt to clarify and respond to your questions.

Please confirm that you are sending the available responsive documents today.

Tobey Marie Daluz
She/Her/Hers
Ballard Spahr LLP
919 N. Market Street, 11th Floor
Wilmington, DE 19801-3034
Direct 302.252.4440
Fax 302.300.4050
Mobile 215.313.3299
daluzt@ballardspahr.com
www.ballardspahr.com

From: Pise, Adi <Adi.Pise@hdrinc.com>
Sent: Monday, November 13, 2023 8:16 AM

To: Daluz, Tobey Marie <DaluzT@ballardspahr.com>

Cc: chesterstormwaterauthority <chesterstormwaterauthority@chesterstormwaterauthority.com>; Steve Hann <shann@hrmml.com>; Van Meter, Lauren <Lauren.VanMeter@hdrinc.com>; Nagavalli, Suhas <Sahas.Nagavalli@hdrinc.com>

Subject: Re: Chester Bankruptcy Information Request for SACC

⚠ EXTERNAL

Thank you. Please let me know if it is helpful To have a call to discuss the pending items. Thanks,
Adi

Get [Outlook for iOS](#)

From: Daluz, Tobey Marie <DaluzT@ballardspahr.com>

Sent: Friday, November 10, 2023 4:15:34 PM

To: Pise, Adi <Adi.Pise@hdrinc.com>

Cc: chesterstormwaterauthority <chesterstormwaterauthority@chesterstormwaterauthority.com>; Steve Hann <shann@hrmml.com>; Van Meter, Lauren <Lauren.VanMeter@hdrinc.com>; Nagavalli, Suhas <Sahas.Nagavalli@hdrinc.com>

Subject: RE: Chester Bankruptcy Information Request for SACC

CAUTION: [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Adi, I will get back to you on the answers to these questions.

Steve, I will hold off on filing the motion for now.

Tobey Marie Daluz

She/Her/Hers

Ballard Spahr LLP

919 N. Market Street, 11th Floor

Wilmington, DE 19801-3034

Direct 302.252.4440

Fax 302.300.4050

Mobile 215.313.3299

daluzt@ballardspahr.com

www.ballardspahr.com

From: Pise, Adi <Adi.Pise@hdrinc.com>

Sent: Friday, November 10, 2023 1:45 PM

To: Daluz, Tobey Marie <DaluzT@ballardspahr.com>

Cc: chesterstormwaterauthority <chesterstormwaterauthority@chesterstormwaterauthority.com>; Steve Hann <shann@hrmml.com>; Van Meter, Lauren <Lauren.VanMeter@hdrinc.com>; Nagavalli, Suhas <Sahas.Nagavalli@hdrinc.com>

Subject: RE: Chester Bankruptcy Information Request for SACC

⚠ EXTERNAL

Tobey Marie,

Let me check internally and get back to you on the date we can deliver the data. In the meantime, I need some additional information on item 10 below. What information are you looking for there? Also, see HDR's response on the other stormwater infrastructure items requested. SAC will be submitting responses/data on the items 3,4,5 and 6. Please let me know your thoughts.

Document(s)	Reason
1. GIS data layers provided as a geodatabase (preferred) and/or shapefile which include the following: a. Existing Storm Pipe summary and 'Ph2 Proposed Storm Pipe Summary GIS or excel files; b. Storm sewer features (pipes, culverts, detention basins, outfalls, etc.); c. Delineations of city owned vs. private stormwater management facilities (detention basins, infiltration beds, rain gardens, inlets, pipes, etc.).	Data was received for catch basins. No storm sewer pipe been received.
2. The number, type, and description of system assets, including manholes, swales, detention basins, outfalls, BMPs, pipes by size and material.	Data was received for catch basins. Not needed if we rec GIS data in 1 above.
4. Capital Improvement Plans (CIP) for current and future projects.	Review of documents provides a basis for concluding that is a current CIP which we did not receive. For example, CIP was received (that CIP appears to be a 5-yr CIP associated years 2018- 2022, with projects scheduled for completion
7. Regulatory permits governing the system.	Received approved NPDES General Permit. Received MS Progress Report for Years 2 & 3 (dated 2016). Are there current MS4 compliance?
8. Pollutant Reduction Plan (PRP) associated with current MS4 Permit and list of completed PRP projects.	We received the PRP dated July 2017.
9. Historic Flooding Data/Reports, Areas of concern regarding flooding	Nothing received.
10. Alternatives Analysis and PENNVEST Second Opinion review for Veterans Memorial Park (VMP) project.	Limited information related to the VMP project was provided for a conceptual sketch, construction drawings, 2017 <i>Project Green Infrastructure Feasibility Evaluation Preliminary</i> the project objective summary included in the "Project Information document (prepared by HDR).

Aditya (Adi) M Pise, P.E., MBA
Project Manager

HDR

3025 Chemical Road, Suite 110
Plymouth Meeting, PA 19462
D 484.612.1138 C 484.362.7512

Adi.Pise@hdrinc.com

hdrinc.com/follow-us

From: Daluz, Tobey Marie <DaluzT@ballardspahr.com>
Sent: Friday, November 10, 2023 1:04 PM
To: Pise, Adi <Adi.Pise@hdrinc.com>
Cc: chesterstormwaterauthority <chesterstormwaterauthority@chesterstormwaterauthority.com>; Steve Hann <shann@hrmml.com>
Subject: RE: Chester Bankruptcy Information Request for SACC

CAUTION: [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thanks for your follow-up, Adi. I planned on returning your call.

Steve, my preference is to agree on a date certain for delivery and avoid the need to file the motion. That's what I am working toward. I also want to avoid a situation where Monday, turns into early next week and that slips to end of week. Can we agree on a day?

Tobey Marie Daluz
She/Her/Hers
Ballard Spahr LLP
919 N. Market Street, 11th Floor
Wilmington, DE 19801-3034
Direct 302.252.4440
Fax 302.300.4050
Mobile 215.313.3299
daluzt@ballardspahr.com
www.ballardspahr.com

From: Pise, Adi <Adi.Pise@hdrinc.com>
Sent: Friday, November 10, 2023 12:37 PM
To: Daluz, Tobey Marie <DaluzT@ballardspahr.com>
Cc: chesterstormwaterauthority <chesterstormwaterauthority@chesterstormwaterauthority.com>; Steve Hann <shann@hrmml.com>
Subject: RE: Chester Bankruptcy Information Request for SACC

⚠ EXTERNAL

Tobey Marie, Hope you are doing well. As indicated in my Voice mail, I am collating the information that your team has requested from the Stormwater Authority of Chester and should be sending that early next week. Please feel free to reach out if you have any questions. Thanks.

Aditya (Adi) M Pise, P.E., MBA
Project Manager

HDR

3025 Chemical Road, Suite 110
Plymouth Meeting, PA 19462
D 484.612.1138 C 484.362.7512

Adi.Pise@hdrinc.com

hdrinc.com/follow-us

From: Steve Hann <shann@hrmml.com>
Sent: Friday, November 10, 2023 12:18 PM
To: Pise, Adi <Adi.Pise@hdrinc.com>; chesterstormwaterauthority
<chesterstormwaterauthority@chesterstormwaterauthority.com>
Subject: FW: Chester Bankruptcy Information Request for SACC

CAUTION: [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Adi,

As a follow-up to my e-mail from yesterday, please see the below e-mails from this morning with bankruptcy counsel for the City.

Steve



Steven A. Hann, Esquire
Hamburg, Rubin, Mullin, Maxwell & Lupin, PC
1684 S. Broad Street, Suite 230
P.O. Box 1479
Lansdale, PA 19446-5422
215.661.0400; Fax 661.0315
SHann@HRMML.com; HRMML.com

Please consider the environment before printing this e-mail

The information contained in this e-mail message is attorney privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this communication is strictly prohibited. Please call us immediately at 215-661-0400 if this is received in error.

From: Steve Hann
Sent: Friday, November 10, 2023 12:16 PM
To: 'Daluz, Tobey Marie' <DaluzT@ballardspahr.com>
Subject: RE: Chester Bankruptcy Information Request for SACC

Tobey – I never said that the Authority would not produce the documents. I merely indicated that I have not yet heard back from the engineer as to the status of the response.



Steven A. Hann, Esquire
Hamburg, Rubin, Mullin, Maxwell & Lupin, PC
1684 S. Broad Street, Suite 230
P.O. Box 1479
Lansdale, PA 19446-5422
215.661.0400; Fax 661.0315
SHann@HRMML.com; HRMML.com

Please consider the environment before printing this e-mail

The information contained in this e-mail message is attorney privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this communication is strictly prohibited. Please call us immediately at 215-661-0400 if this is received in error.

From: Daluz, Tobey Marie <DaluzT@ballardspahr.com>
Sent: Friday, November 10, 2023 11:54 AM
To: Steve Hann <shann@hrmml.com>
Subject: RE: Chester Bankruptcy Information Request for SACC

Thank you, Steve. Based on your voicemail, it appears that you are not in a position to confirm that SACC will produce the items requested by a date certain, we have no option other than to proceed with the filing of a 2004 motion. My preference is to avoid unnecessary litigation but we are in a position of having to move the bankruptcy case forward in a more expeditious fashion. If we file the motion, it can always be resolved consensually or withdrawn if and when we receive the documents.

Feel free to contact me if you have any questions.

Tobey Marie Daluz
She/Her/Hers
Ballard Spahr LLP
919 N. Market Street, 11th Floor
Wilmington, DE 19801-3034
Direct 302.252.4440
Fax 302.300.4050
Mobile 215.313.3299
daluzt@ballardspahr.com
www.ballardspahr.com

From: Steve Hann <shann@hrmml.com>
Sent: Friday, November 10, 2023 9:48 AM
To: Daluz, Tobey Marie <DaluzT@ballardspahr.com>
Subject: RE: Chester Bankruptcy Information Request for SACC

EXTERNAL

Tobey,

I just left you a voicemail message.

Steve



Steven A. Hann, Esquire
Hamburg, Rubin, Mullin, Maxwell & Lupin, PC
1684 S. Broad Street, Suite 230
P.O. Box 1479
Lansdale, PA 19446-5422
215.661.0400; Fax 661.0315
SHann@HRMML.com; HRMML.com

Please consider the environment before printing this e-mail

The information contained in this e-mail message is attorney privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this communication is strictly prohibited. Please call us immediately at 215-661-0400 if this is received in error.

From: Daluz, Tobey Marie <DaluzT@ballardspahr.com>
Sent: Thursday, November 9, 2023 5:28 PM
To: Steve Hann <shann@hrmml.com>
Subject: RE: Chester Bankruptcy Information Request for SACC

Steve –

Pursuant to Local Rule 2004-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Eastern District of Pennsylvania, this email shall serve as an invitation to meet and confer regarding the request for documents originally directed to the Stormwater Authority of the City of Chester on June 16, 2023. While we acknowledge receipt of responsive documents in June and August 2023, we have received no response to our follow-up request dated October 27, 2023. As previously noted, the vast majority of the items identified in the attached supplemental request relate back to the original request. If we do not hear from you by the close of business tomorrow, we will conclude that SACC has no intention to provide the documents on a consensual basis.

The City reserves its right to file a Rule 2004 motion with the Bankruptcy Court to obtain the documents.

Tobey Marie Daluz
She/Her/Hers
Ballard Spahr LLP
919 N. Market Street, 11th Floor
Wilmington, DE 19801-3034
Direct 302.252.4440
Fax 302.300.4050
Mobile 215.313.3299
daluzt@ballardspahr.com
www.ballardspahr.com

From: Daluz, Tobey Marie
Sent: Monday, November 6, 2023 10:08 AM
To: 'SHann@HRMML.com' <SHann@HRMML.com>
Subject: RE: Chester Bankruptcy Information Request for SACC

Steve, just following up on this email.

Tobey Marie Daluz
She/Her/Hers
Ballard Spahr LLP
919 N. Market Street, 11th Floor
Wilmington, DE 19801-3034

Direct 302.252.4440
Fax 302.300.4050
Mobile 215.313.3299
daluzt@ballardspahr.com
www.ballardspahr.com

From: Daluz, Tobey Marie
Sent: Friday, October 27, 2023 6:04 PM
To: 'SHann@HRMML.com' <SHann@HRMML.com>
Subject: Chester Bankruptcy Information Request for SACC

Steve:

Thank you for SACC's responses to the information request that was originally transmitted in June of this year. After reviewing the documents provided, we have some follow-up requests and inquiries.

Attached is a list of items that are still needed by the City in connection with the bankruptcy and our goal to accomplish a viable plan of adjustment for the City and its residents. Most of the items were included in the original request. If responsive documents don't exist in the form that was requested, it would be helpful if SACC could note that. Also, the attached list includes a couple of requests that arise from our review of the original information produced. The list also explains the reason for the follow-up request.

I have attached the original communication for your convenience. Let me know if you have any questions or you would like to discuss.

Tobey Marie Daluz
She/Her/Hers

Ballard Spahr
LLP

DIVERSITY
EQUITY + INCLUSION

919 N. Market Street, 11th Floor
Wilmington, DE 19801-3034
302.252.4440 DIRECT
302.300.4050 FAX

215.313.3299 MOBILE | daluzt@ballardspahr.com
VCARD

www.ballardspahr.com